

Exhibit B

SOVERAIN'S PROPOSED CLAIM CONSTRUCTIONS AND SUPPORT

List of Sources for Extrinsic Evidence

American Heritage Dictionary, Third Edition, Dell Publishing, New York, New York, 1994 (“American Heritage”) (SVN2-0072339 – SVN2-0072348; SVN2-0072360 – SVN2-0072363).

Berners-Lee, T. et al., Hypertext Transfer Protocol -- HTTP/1.0, March 8, 1995, *available at* <ftp://ftp.ics.uci.edu/pub/ietf/http/history/draft-ietf-http-v10-spec-00.txt> (“HTTP/1.0”) (SVN2-0072365 – SVN2-0072418).

Dictionary of Banking Terms, Second Edition, Barron’s Educational Series, Inc., Hauppauge, New York, U.S.A., 1993 (“Banking Terms”) (SVN2-0072325 – SVN2-0072327).

Fielding, R., Relative Uniform Resource Locators, Request for Comments 1808, UC Irving, June 1995, *available at* <http://www.ietf.org/rfc/rfc1808.txt> (“RFC 1808”) (SVN2-0072435 – SVN2-0072449).

IBM Dictionary of Computing, Tenth Edition, McGraw-Hill, Inc., 1993 (“IBM”) (SVN2-0072419 – SVN2-0072427).

IEEE Standard Dictionary of Electrical and Electronics Terms, Fifth Edition, IEEE Std 100-1992, Published by the Institute of Electrical and Electronics Engineers, Inc. (“IEEE 5th Ed.”) (SVN2-0072309 – SVN2-0072316).

IEEE Standard Dictionary of Electrical and Electronics Terms, Sixth Edition, IEEE Std 100-1996, Published by the Institute of Electrical and Electronics Engineers, Inc. (“IEEE 6th Ed.”) (SVN2-0072317 – SVN2-0072324; SVN2-0072428 – SVN2-0072430).

Merriam-Webster’s Collegiate Dictionary, Ninth Edition, Merriam-Webster, Inc., Springfield, Massachusetts, U.S.A., 1989 (“Webster’s (1989)”) (SVN2-0072450 - SVN2-0072452).

Merriam-Webster’s Collegiate Dictionary, Ninth Edition, Merriam-Webster, Inc., Springfield, Massachusetts, U.S.A., 1990 (“Webster’s (1990)”) (SVN2-0072349 - SVN2-0072359).

Microsoft Press Computer Dictionary, Third Edition, Microsoft Press, 1997 (“Microsoft”) (SVN2-0072328 – SVN2-0072338; SVN2-0072431 – SVN2-0072434).

Soverain Software LLC v. Amazon.com, Inc., 6:04cv14, Dkt. Item 245, slip op (E.D. Tex. April 7, 2005) (“Amazon Markman Order”) (SVN2-0072273 – SVN2-0072308).

Soverain's Proposed Claim Constructions and Support¹

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
1.	Buyer computer for operation by a user desiring to buy products '314 patent: claims 34, 39 '492 patent: claim 17, 18, 35, 36	defendants	a computer for operation by a user desiring to buy products where "computer" means a functional unit that can perform substantial computation, including numerous arithmetic operations or logic operations without human intervention	<u>'314/'492 Disclosure</u> ² Abstract FIG. 1 Col. 1, ll. 17 – 23 Col. 2, ll. 19 – 42 Col. 3, ll. 38 – 56 Col. 10, ll. 27 – 31 <u>'314 Claims</u> 34, 39 <u>'492 Claims</u> 17, 18, 35, 36 <u>'424 Disclosure</u> ³ Abstract FIG. 1 Col. 5, l. 60 – Col. 6, l. 2	<i>Amazon</i> Markman Order IEEE 5th Ed. at p. 230 IEEE 6th Ed. at p. 192

¹ Defendants have adopted the claim-construction positions taken by Defendant Amazon in *Soverain v. Amazon* with respect to the following claim terms: "Shopping cart database," "Shopping cart," "Plurality of products added to . . . shopping cart / [Add a] plurality of respective products to a shopping cart," "Service request," and "Session identifier." In addition, Newegg adopted the claim-construction position taken by Amazon with respect to the claim term "Shopping Cart Computer." Appendix C, Defendants' Preliminary Claim Construction Chart, at 1 n.1. In response, Soverain reserves the right to rely upon the intrinsic and extrinsic evidence cited by Soverain in the P.R. 4-3 submission in the *Soverain v. Amazon* case and the Markman Order in that case.

² U.S. Pat. No. 5,715,314 ("314 patent") and U.S. Pat. No. 5,909,492 ("492 patent") share the same specification. The column-and-line citations refer to the '314 patent, even if the construed term appears only in the '492 patent.

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
2.	Being programmed to receive a plurality of requests from a user '314 patent: claims 34 '492 patents: claims 17, 35	Soverain	containing a set of instructions for receiving a plurality of requests from a user	<u>'314/'492 Disclosure</u> FIGS. 2A – 2I, 3A – 3B, 4A – 4C Col. 1, ll. 17 – 23 Summary of the Invention Col. 4, ll. 46 – 50 Col. 9, l. 51 – Col. 10, l. 20 Col. 10, ll. 27 – 31 Appendices A – G <u>'424 Disclosure</u> Col. 5, l. 60 – Col. 6, l. 2	Microsoft at p. 384 IEEE 5th Ed. at p. 1013 IEEE 6th Ed. at p. 825 American Heritage at p. 661 Webster's (1990) at p. 940 IBM at p. 535

(continued...)

³ The '314 patent incorporates U.S. App No. 09/168,519, later abandoned, by reference. A continuation of that application, U.S. App. No. 08/563,745, issued as U.S. Pat. No. 5,724,424 ("424 patent"). For convenience, reference is made to columns and lines of the '424 patent instead of U.S. App. No. 09/168,519.

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
3.	Shopping cart computer '314 patent: claims 34, 35, 39, 49, 74, 84, 109, 134, 144 '492 patent: claims 17, 18, 35, 36	defendants	a computer processing data associated with one or more shopping carts <i>See construction of "computer" in term 1</i>	<u>'314/'492 Disclosure</u> FIG. 3A – 3B Col. 1, ll. 18 – 47 Col. 2, ll. 19 – 42 Col. 4, ll. 35 – 45 Col. 5, ll. 5 – 15 Col. 7, l. 55 – Col. 8, l. 31 Col. 10, ll. 27 – 31 Appendices F, G <u>'314 Claims</u> 1 – 33, 34, 35, 39, 49, 74, 84 – 109, 134, 144 – 168 <u>'492 Claims</u> 17, 18, 35, 36 <u>'314 File History</u> Amendment, 12/19/96	<i>Amazon</i> Markman Order

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
4.	Shopping cart database '314 patent claims 34, 39 '492 patents claims 17, 18, 35, 36	defendants	a database of stored representations of collections of products where “database” means a collection of logically related data stored together in one or more computerized files	<u>'314/'492 Disclosure</u> FIGS. 1, 3A – 3B Col. 2, ll. 19 – 42 Col. 5, ll. 5 – 15 Col. 7, ll. 55 – 59 Col. 10, ll. 27 – 31 <u>'314 Claims</u> 34, 39 <u>'492 Claims</u> 17, 18, 35, 36 <u>'314 File History</u> Amendment, 12/19/96	<i>Amazon</i> Markman Order IEEE 5th Ed. at p. 304 IEEE 6th Ed. at p. 251 Microsoft at p. 129

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
5.	Shopping cart message '314 patent: claims 34, 39, 84, 144 '492 patent: claims 17, 18, 35, 36	defendants	a message concerning a shopping cart <i>See term 6</i>	<u>'314/'492 Disclosure</u> FIGS. 3A – 3B Col. 2, ll. 19 – 42 Col. 9, l. 51 – Col. 10, l. 20 Col. 10, ll. 27 – 31 Appendices A – D <u>'314 Claims</u> 34, 39, 60 – 73, 84, 120 – 133, 144 <u>'492 Claims</u> 17, 18, 35, 36	<i>Amazon</i> Markman Order <u>'639 Disclosure</u> Col. 3, l. 54 – Col. 4, l. 21 RFC 1808
6.	Shopping cart '314 patent: claims 34, 36, 39 '492 patent: claims 17, 18, 35, 36	defendants	a stored representation of a collection of products	<u>'314/'492 Disclosure</u> FIGS. 2A – 2I, 3A – 3B Col. 2, ll. 19 – 42 Col. 10, ll. 27 – 31 <u>'314 Claims</u> 34, 36, 39 <u>'492 Claims</u> 17, 18, 35, 36 <u>'314 File History</u> Amendment, 12/19/96	<i>Amazon</i> Markman Order

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
7.	Plurality of products added to . . . shopping cart / [Add a] plurality of respective products to a shopping cart '314 patent: claims 34, 36, 39 '492 patent: claim 17, 18, 35, 36	defendants	product identifiers which are added to an instance of a shopping cart in the shopping cart database / [add] identifiers of respective products to an instance of a shopping cart <i>See terms 4, 6</i>	<u>'314/'492 Disclosure</u> Col. 2, ll. 19 – 42 Col. 5, ll. 5 – 15 Col. 7, ll. 55 – 59 Col. 10, ll. 27 – 31 <u>'314 Claims</u> 34, 36, 38, 39 <u>'492 Claims</u> 17, 18, 35, 36	<i>Amazon</i> Markman Order

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
8.	Payment message '314 patent: claims 34, 35, 39, 49, 74, 109, 134 '492 patent: claim 17, 18, 35, 36	defendants	a message relating to a payment for one or more products	<u>'314/'492 Disclosure</u> FIGS. 2A – 2I, 3A – 3B Col. 2, ll. 32 – 42 Col. 3, ll. 38 – 47 Col. 9, l. 51 – Col. 10, l. 20 Col. 10, ll. 27 – 31 <u>'314 Claims</u> 1, 7, 8, 12, 33, 34, 39, 87, 147 <u>'492 Claims</u> 11, 13, 17, 18, 35, 36	<i>Amazon</i> Markman Order

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
9.	To cause said payment message to be activated to initiate a payment transaction ⁴ '314 patent: claims 34, 39 '492 patent: claim 17, 18, 35, 36	defendants	to cause an action associated with said payment message to initiate a payment transaction <i>See term 8</i>	<u>'314/'492 Disclosure</u> FIG. 3B Col. 1, ll. 17 – 23 Col. 8, ll. 25 – 28 Col. 10, ll. 27 – 31 <u>'314 Claims</u> 1, 20, 21, 34, 39, 49, 74 <u>'492 Claims</u> 17, 18, 35, 36 <u>'424 Disclosure</u> FIGS. 2, 3, 5, 8 Col. 5, ll. 7 – 28 Col. 5, ll. 45 – 59 Col. 7, ll. 15 – 38	IBM at p. 9

⁴ Although the defendants' P.R. 4-1 disclosures identified the phrase "to cause said payment message to be activated" as requiring construction, Soverain believes, and so indicated in its P.R 4-2 disclosures, that the complete phrase identified above (which includes the phrase identified by the defendants) should be construed.

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
10.	A Shopping Cart URL '314 patent: claims 60, 65, 120, 125	defendants	a URL concerning a shopping cart <i>See term 6</i>	'314/'492 Disclosure Col. 5, l. 26 – Col. 6, l. 42 Col. 7, ll. 14 – 30 Col. 8, l. 14 – Col. 9, l. 2 Col. 9, l. 51 – Col. 10, l. 20 Col. 10, ll. 27 – 31 Appendices A – D <u>'314 Claims</u> 34, 39, 60 – 73, 120 – 133 <u>'492 Claims</u> 17, 18, 35, 36	Microsoft at p. 405 <u>'639 Disclosure</u> Col. 3, l. 54 – Col. 4, l. 21 RFC 1808
11.	Hypertext link '492 patent: claim 15, 16	defendants	a non-sequential web association which the user can use to navigate through related topics	'314/'492 Patent Col. 1, ll. 17 – 23 Col. 9, l. 51 – Col. 10, l. 20 Col. 10, ll. 27 – 31 Appendices A – D <u>'424 Disclosure</u> Col. 4, l. 61 – Col. 5, l. 6	<i>Amazon</i> Markman Order Microsoft at p. 240 <u>'639 Disclosure</u> FIGS. 2A-2B, 4, 5; Col. 1, l. 66 – Col. 4, l. 22; Col. 5, l. 18 – Col. 5, l. 41; Col. 6, ll. 17 – 26; Col. 8, ll. 27 – 50 <u>'639 Claims</u> 1, 62, 78

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
12.	A statement URL '492 patent: claim 41, 76	defendants	a URL concerning a statement	<u>'314/'492 Disclosure</u> FIG. 4A Col. 5, l. 26 – Col. 6, l. 42 Col. 7, ll. 14 – 30 Col. 8, l. 14 – Col. 9, l. 2 Col. 9, l. 51 – Col. 10, l. 20 Col. 10, ll. 27 – 31 Appendices A – D <u>'492 Claims</u> 15, 16, 41, 42, 76, 77	Microsoft at p. 405 <u>'639 Disclosure</u> Col. 3, l. 54 – Col. 4, l. 21 RFC 1808
13.	A transaction log identifier '492 patent : claims 67, 102	defendants	a text string that identifies a transaction log	<u>'314/'492 Disclosure</u> FIGS. 12, 13 Col. 9, ll. 19 – 25 Col. 10, ll. 27 – 31	<i>See Amazon Markman Order</i> Microsoft at p. 243 IBM at p. 428
14.	an initiator number '492 patent : claims 67, 102	defendants	a number concerning an entity starting a funds transfer	<u>'314/'492 Disclosure</u> FIGS. 12, 13 Col. 9, ll. 19 – 25 Col. 10, ll. 27 – 31	

U.S. Patent Nos. 5,715,314 and 5,909,492					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
15.	a beneficiary number '492 patent : claims 67, 102	defendants	a number concerning an entity receiving a funds transfer	<u>'314/'492 Disclosure</u> FIGS. 12, 13 Col. 9, ll. 19 – 25 Col. 10, ll. 27 – 31	Banking Terms at p. 77

U.S. Patent No. 6,272,639					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
16.	Service request '639 patent: claims 1, 10, 60, 65, 78, 79	defendants	a solicitation of services from a client to a server. A service request may entail the exchange of any number of messages between the client and the server.	<u>'639 Disclosure</u> FIG. 3 Col. 1, ll. 24 – 47 Col. 3, ll. 6 – 19 Col. 10, ll. 19 – 23 <u>'639 File History</u> Amendment, 10/19/06 and attached 1.131 declaration	<i>Amazon</i> Markman Order IEEE 6th Ed. at pp. 974 – 975 HTTP/1.0
17.	Session identifier '639 patent: claims 1, 10, 47, 63, 78, 79	defendants	a text string that identifies a session <i>See</i> term 18	<u>'639 Disclosure</u> FIGS. 2A, 2B, 3 throughout the specification <i>see, e.g.,</i> Abstract Col. 3, l. 6 – Col. 4, l. 30 Col. 8, ll. 1 – 4 Col. 10, ll. 19 – 23 <u>'780 Claims</u> throughout, <i>see, e.g.,</i> 1, 2, 3, 11, 14, 15, 21, 32, 34 <u>'639 File History</u> Amendment, 12/28/2001, at 4 – 5	<i>Amazon</i> Markman Order Microsoft at p. 243

U.S. Patent No. 6,272,639					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
18.	Session '639 patent: claims 1, 10, 47, 63, 78, 79	defendants	a series of requests and responses to perform a complete task or set of tasks between a client and a server system	<p><u>'639 Disclosure</u> FIG. 3 Summary of the Invention Col. 2, ll. 9 – 14 Col. 3, ll. 20 – 41 Col. 6, l. 35 – Col. 7, l. 13 Col. 7, ll. 52 – 67 Col. 8, ll. 27 – Col. 9, l. 6 Col. 10, ll. 19 – 23</p> <p><u>'639 File History</u> Amendment, 12/28/2001, at 4 – 5</p> <p><u>'314/'492 Disclosure</u> Col. 7, ll. 40 – 54</p>	<i>Amazon</i> Markman Order IBM at pp. 323 – 24

U.S. Patent No. 6,272,639					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
19.	Appending the stored session identifier to each of the subsequent distinct requests '639 patent: claim 1	defendants	tagging, adding, affixing or supplementing the stored session identifier to each of the subsequent distinct requests <i>See terms 16, 17</i>	<u>'639 Disclosure</u> FIGS. 2A, 2B, 3, 6 Col. 1, l. 48 – Col. 2, l. 39 Col. 3, l. 54 – Col. 4, l. 30 Col. 5, ll. 42 – 65 Col. 7, l. 22 – Col. 9, l. 65 Col. 10, ll. 19 – 23 <u>'780 Claims</u> 58, 111 <u>'639 File History</u> Amendment, 12/28/01, at 4 – 5, 7 Amendment, 10/19/06 and attached 1.131 declaration	<i>See Amazon Markman Order</i> IEEE 6th Ed. at p. 1049 Microsoft at pp. 26, 450 American Heritage at pp. 40, 800 – 01 Webster's (1990) at p. 96 HTTP/1.0

U.S. Patent No. 6,272,639					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
20.	Validating, at the server system, the appended session identifier '639 patent: claim 47	defendants	at the server system, determining the validity of the appended session identifier <i>See terms 17, 19</i>	<u>'639 Disclosure</u> Col. 3, ll. 42 – 47 Col. 6, ll. 5 – 16 Col. 10, ll. 19 – 23 <u>'780 Disclosure</u> Col. 43 – 46 <u>'649 File History</u> Amendment, 12/28/01, at 4 – 5 Amendment, 10/19/06, and attached 1.131 declaration	Microsoft at p. 490 Webster's (1990) at p. 1302
21.	user identifier '639 patent: claim 60	defendants	a text string that identifies a user	<u>'639 Disclosure</u> Col. 1, ll. 13 – 25 Col. 5, ll. 42 – 65 Col. 8, ll. 1 – 13 Col. 8, l. 51 – Col. 9, l. 6 Col. 10, ll. 19 – 23 <u>'639 Claims</u> 2, 14, 23, 32, 60, 61	<i>See Amazon Markman Order</i> Microsoft at p. 243 IBM at pp. 323 – 24, 724

U.S. Patent No. 6,272,639					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
22.	A purchase request / a request for purchase '639 patent: claim 60	defendants	One or more messages requesting a purchase	<u>'639 Disclosure</u> Col. 2, l. 54 – Col. 3, l. 2 Col. 10, ll. 19 – 23 <u>'639 Claims</u> 60, 61	
23.	Accessing, upon receipt of the purchase request at the server system, user information associated with the user identifier sufficient to charge an account associated with the user '639 patent: claim 60	defendants	upon receipt of the purchase request at the server system, obtaining access to user information associated with the user identifier sufficient to charge an account associated with the user <i>See term 22</i>	<u>'639 Disclosure</u> Abstract Col. 2, ll. 9 – 14 Col. 6, l. 35 – Col. 7, l. 14 Col. 8, ll. 28 – Col. 9, l. 20 Col. 9, ll. 52 – Col. 10, l. 11 Col. 10, ll. 19 – 23 <u>'639 Claims</u> 60, 62 <u>'314/'492 Disclosure</u> FIGS. 2A – 2I, 7 Col. 6, ll. 23 – 29 Col. 7, ll. 14 – 15	IEEE 5th Ed. at p. 6 IEEE 6th Ed. at p. 5 Microsoft at p. 12 American Heritage at p. 5 Webster's (1990) at p. 49 IBM at p. 3

U.S. Patent No. 6,272,639					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
24.	Charging the user . . . according to the user information '639 patent: claim 60	defendants	charging an account associated with the user according to the user information	<u>'639 Disclosure</u> Col. 2, ll. 9 – 14 Col. 8, l. 27 – Col. 9, l. 6 Col. 10, ll. 19 – 23 <u>'639 Claims</u> 23, 27, 31, 59, 60, 62 <u>'314/'492 Disclosure</u> FIGS. 2A – 2I, 7 Col. 6, ll. 23 – 29 Col. 7, ll. 14 – 15	American Heritage at p. 148 Webster's (1990) at p. 49 Webster's (1989) at p. 227 IBM at p. 100
25.	Fulfilling the purchase request based on the user information '639 patent: claim 60	defendants	carrying out the purchase request based on the user information <i>See term 22</i>	<u>'639 Disclosure</u> Col. 2, ll. 9 – 14 Col. 10, ll. 19 – 23 <u>'314/'492 Disclosure</u> Col. 4, l. 50 – 65 Col. 10, ll. 19 – 23 <u>'639 Claims</u> 60, 62	American Heritage at p. 341

U.S. Patent No. 6,272,639					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
26.	Creating, responsive to the initial service request, the session identifier '639 patent: claim 79	defendants	producing, in response to the initial service request, the session identifier <i>See terms 17, 29</i>	'639 Disclosure FIG. 2B Col. 5, ll. 42 – 65 Col. 6, l. 27 – Col. 7, l. 13 Col. 10, ll. 19 – 23 <u>'639 Claims</u> 10, 69, 79	<i>See Amazon Markman Order,</i> <i>see, e.g.,</i> discussion of the term “creating a database” American Heritage at p. 203 Webster’s (1990) at p. 304

U.S. Patent No. 6,272,639					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
27.	Hyperlink '639 patent: claim 62	defendants	a non-sequential web association which the user can use to navigate through related topics	<p><u>'639 Disclosure</u> FIGS. 2A – 2B, 4, 5 Col. 1, l. 66 – Col. 4, l. 22 Col. 2, ll. 9 – 14 Col. 5, l. 18 – Col. 5, l. 41 Col. 6, ll. 17 – 26 Col. 8, ll. 27 – 50 Col. 10, ll. 19 – 23</p> <p><u>'639 Claims</u> 1, 62, 78</p> <p><u>'314/'492 Disclosure</u> Col. 1, ll. 17 – 23 Col. 9, l. 51 – Col. 10, l. 20 Appendices A – D</p> <p><u>'424 Disclosure</u> Col. 14, l. 61 – Col. 5, l. 6</p>	<i>See Amazon</i> Markman Order Microsoft at p. 240
28.	An identifier of a purchaser '639 patent: claim 62	defendants	a text string that identifies a purchaser	<p><u>'639 Claims</u> 62</p>	<i>See Amazon</i> Markman Order Microsoft at p. 243

U.S. Patent No. 6,272,639					
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Intrinsic Support	Extrinsic Evidence
29.	Initial service request '639 patent: claims 10, 79	Soverain	the first service request in a session <i>See terms 16, 18</i>	<u>'639 Disclosure</u> FIGS. 2A – 2B, 4 Col. 5, l. 18 – Col. 6, l. 34 Col. 10, ll. 19 – 23 <u>'639 Claims</u> 1, 10, 78, 79 <u>'639 File History</u> Amendment, 12/28/01, at 4	American Heritage at p. 431 Webster's (1990) at p. 622
30.	Controlled document '639 patent: claim 47	Soverain	a document that can be accessed when one or more conditions are met	<u>'639 Disclosure</u> Abstract FIGS. 2A – 2B, 4 Col. 2, l. 40 – Col. 3, l. 2 Col. 3, l. 20 – Col. 4, l. 21 Col. 5, ll. 18 – Col. 6, l. 17 Col. 6, l. 57 – Col. 7, l. 21 Col. 7, ll. 35 – 67 Col. 8, ll. 59 – Col. 9, l. 6 Col. 9, l. 66 – Col. 10, l. 11 Col. 10, ll. 19 – 23 <u>'639 Claims</u> 47	IEEE at p. 5 IBM at p. 3